

ENCLOSURE 3
SBA SHIPYARD SUPERFUND SITE
JENNINGS, JEFFERSON PARISH, LOUISIANA

INFORMATION REQUEST

QUESTIONS

Section 1

1. Do you have or have you ever had a corporate relationship with any of the following entities: ?
 - a. If so, explain your corporate relationship and provide all corporate documentation with respect to your corporate relationship with the entities in question 1 above.
2. Were you involved in the day-to-day operations of the entity identified in question 1 between 1965 and 1993?
 - a. If so, describe your role in such day-to-day operations.
3. Have you in any way been involved with the Site?
 - a. If so, please describe your involvement with the Site.
4. Provide copies of documents related to any involvement identified in question 3(a) above.
5. If you have had any involvement with the Site and/or on behalf of the entities in question 1 above, please provide responses to the questions below.

Section 2

6. Please identify any dealings or transactions you have or had with SBA Shipyards, Inc., Louis Smailhall, Suzanne Smailhall, LEEVAC Shipyards, Inc., n/k/a Bunge Street Properties, LLC, and LEEVAC Industries, LLC n/k/a LEEVAC Shipyards Jennings, LLC. Please provided a brief description of the nature of those dealings or transactions and the timeframes during which those dealings and transactions occurred.
 - a. Specifically, provide date(s) that your barge(s) were sent and/or removed from the Site, the type of product and/or material your barges brought to the Site, the name and contact information of the person who made such arrangements.
7. Please provide any and all documents in your possession that are related to the dealings and transactions detailed in Question 6 above.
8. If any of the dealings or transactions described involve hazardous materials, please include a detailed listing of such materials, the materials data safety sheet, dates of transaction, and any quantity associated with those materials.